

HONORABLE MARY JO HESTON

HEARING DATE: APRIL 20, 2021
HEARING TIME: 9:00 A.M. (PST)
LOCATION: TELEPHONIC
RESPONSES DUE: APRIL 13, 2021

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

PNW HEALTHCARE HOLDINGS, LLC, et al.,¹

Debtors.

No. 19-43754-MJH
(Jointly Administered)

NOTICE OF HEARING ON THE OFFICIAL
UNSECURED CREDITORS COMMITTEE'S
SIXTEENTH OMNIBUS CLAIMS
OBJECTION (DUPLICATE CLAIMS)

PARTIES RECEIVING THIS NOTICE SHOULD REVIEW EXHIBIT B TO THE OBJECTION TO DETERMINE IF THEIR CLAIM IS SUBJECT TO THE OBJECTION. PARTIES WHOSE CLAIMS ARE LISTED IN EXHIBIT B ATTACHED TO THE OBJECTION MAY HAVE SUBSTANTIVE RIGHTS AFFECTED BY THIS OBJECTION, INCLUDING HAVING THEIR CLAIMS DISALLOWED AND EXPUNGED. ANY PARTY WHO DISPUTES THE TREATMENT OF THEIR CLAIM IN ACCORDANCE WITH THE OBJECTION MUST FILE A RESPONSE TO THE OBJECTION IN ACCORDANCE WITH THE INSTRUCTIONS BELOW.

¹ The debtors and debtors-in-possession in the above-captioned, jointly administered chapter 11 bankruptcy proceedings, along with the last four digits of each Debtor's federal tax identification number, are: PNW Healthcare Holdings, LLC (9801); North Auburn Health, LLC dba North Auburn Rehabilitation & Health Center (3159); Sequim Health, LLC dba Sequim Health & Rehabilitation (7737); Bremerton Health, LLC dba Bremerton Convalescent & Rehabilitation Center (3188); Crestwood Convalescent-Port Angeles, LLC dba Crestwood Health & Rehabilitation Center (6565); Fir Lane Health-Shelton, LLC dba Fir Lane Health & Rehabilitation Center (7798); Forest Ridge Health-Bremerton, LLC dba Forest Ridge Health & Rehabilitation Center (4019); Meadow Park Health-St Helen, LLC dba Meadow Park Health & Specialty Care Center (9109); Cherrywood Place-Spokane, LLC dba Cherrywood Place (7776); Riverside Nursing-Centralia, LLC dba Riverside Nursing & Rehabilitation Center (3792); PNW Master Tenant I, LLC (9824); Franklin Hills Health-Spokane, LLC dba Franklin Hills Health & Rehabilitation Center (1763); Aldercrest Health-Edmonds, LLC dba Aldercrest Health & Rehabilitation Center (3827); PNW Master Tenant II, LLC (5319); Gardens on University-Spokane Valley, LLC dba The Gardens on University (1917); Puget Sound Healthcare-Olympia, LLC dba Puget Sound Healthcare Center (4419); Care Center East Health-Portland, LLC dba Care Center East Health & Specialty Care Center (8950); LaCrosse Health-Coeur d'Alene, LLC dba LaCrosse Health & Rehabilitation Center (8594); Ivy Court-Coeur d'Alene, LLC dba Ivy Court (3197); Cornerstone Healthcare Services, LLC (1265); and CRN Pool, LLC (9083).

NOTICE OF HEARING ON THE OFFICIAL UNSECURED
CREDITORS COMMITTEE'S SIXTEENTH OMNIBUS
CLAIMS OBJECTION (DUPLICATE CLAIMS) – Page 1

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1 TO: THE CLERK OF THE COURT
2 AND TO: THE HONORABLE MARY JO HESTON
3 AND TO: PARTIES-IN-INTEREST
4 HEARING DATE: APRIL 20, 2021
5 HEARING TIME: 9:00 A.M. (PST)
6 RESPONSE DUE: APRIL 13, 2021
7 LOCATION: TELEPHONIC

8 Telephonic Hearing Dial-in information:

9 **Judge Mary Jo Heston**

10 Dial: 1-888-363-4749

11 Enter Access Code: 5635947#

12 Press the # sign

13 Enter Security Code when prompted: 3887#

14 Speak your name when prompted

15 **PLEASE TAKE NOTICE** that on March 19, 2021, the Official Committee of Unsecured
16 Creditors (the “Committee”) filed the *Official Unsecured Creditors Committee’s Sixteenth Omnibus
17 Claims Objection (Duplicate Claims)* (the “Objection”) with the United States Bankruptcy Court for
18 the Western District of Washington (the “Bankruptcy Court”). The Objection is on file with the
19 Bankruptcy Court. Any party desiring information as to the details may request same from the Clerk
20 of the Court or from the undersigned counsel. The Objection is also available, free of charge, on the
21 website of the Debtors’ claims Agent, Omni Agent Solutions:

22 <https://cases.omniagentsolutions.com/home?clientId=CsgAAncz+6aL3EGc5HC3w4jXGs+Pk5cc6086wMZNtTjxcYVIJxLyHqUpBKmc+hLe9FQZec+614U=>

23 **Your claim may be eliminated.** Through the Objection, the Committee is seeking to have
the claims on **Exhibit B** disallowed and expunged. You should read these papers carefully and
discuss them with your attorney, if you have one.

PLEASE TAKE FURTHER NOTICE that, if your do not want the Bankruptcy Court to
eliminate or change your claim, then on or before **April 13, 2021** (the “Response Deadline”) you must
file a written response to the Objection (a “Response”) with the United States Bankruptcy Court for
the Western District of Washington, Union Station, 1717 Pacific Avenue, Ste 2100, Tacoma,
Washington 98402-3233. If you mail your Response to the Bankruptcy Court for filing, you must mail
it early enough so that the Bankruptcy Court will **receive** it on or before the Response Deadline. At
the same time, any party submitting a Response must serve a copy of its Response upon the
undersigned counsel to the Committee so as to be received on or before the Response Deadline.

NOTICE OF HEARING ON THE OFFICIAL UNSECURED
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1 **PLEASE TAKE FURTHER NOTICE** that any Response must contain, at a minimum, the
2 following:

3 (a) A caption setting forth the name of the Bankruptcy Court, the name of the
4 Reorganized Debtor, the case number, and the title of the Objection to which the Response is
5 directed;

6 (b) The name of the claimant and his/her/its claim number;

7 (c) The specific factual basis and supporting legal argument upon which the
8 claimant will rely in opposing this Objection;

9 (d) Any supporting documentation, to the extent it is not included in the proof of
10 claim previously filed with the claims agent, upon which the party will rely in order to support
11 the basis for and amounts asserted in the proof of claim; and

12 (e) The name, address, telephone number, and email of the person(s) (which must
13 be the claimant or the claimant's legal representative) with whom counsel for the Committee
14 should communicate with respect to the claim or the Objection and who possess authority to
15 reconcile, settle, or otherwise resolve the objection to the disputed claim on behalf of the
16 claimant.

17 **PLEASE TAKE FURTHER NOTICE THAT A TELEPHONIC HEARING WITH
18 RESPECT TO THE OBJECTION WILL BE HELD ON APRIL 20, 2021 AT 9:00 A.M. (PST).**

19 **IF YOU FAIL TO RESPOND TO THE OBJECTION IN ACCORDANCE WITH THIS
20 NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE
21 OBJECTION WITHOUT FURTHER NOTICE OR OPPORTUNITY FOR A HEARING.**

22 **IF YOU OR YOUR ATTORNEY DO NOT TAKE THESE STEPS, THE
23 BANKRUPTCY COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE OBJECTION
TO YOUR CLAIM.**

[Signature Page Follows]

1 Dated: March 19, 2021

BUSH KORNFELD LLP

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19 *Attorneys for the Official Unsecured Creditors'*
20 *Committee of PNW Healthcare Holdings, LLC*

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22
23
NOTICE OF HEARING ON THE OFFICIAL UNSECURED
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